

**LODGED**  
CLERK, U.S. DISTRICT COURT  
**2/06/2025**  
CENTRAL DISTRICT OF CALIFORNIA  
BY: asi DEPUTY

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**FILED**  
CLERK, U.S. DISTRICT COURT  
**02/06/2025**  
CENTRAL DISTRICT OF CALIFORNIA  
BY: KL DEPUTY

15 Attorneys for Plaintiff  
16 UNITED STATES OF AMERICA

17 UNITED STATES DISTRICT COURT

18 FOR THE CENTRAL DISTRICT OF CALIFORNIA

19 UNITED STATES OF AMERICA,

20 No. 2:25-mj-00528-DUTY

21 Plaintiff,

22 GOVERNMENT'S NOTICE OF REQUEST FOR  
DETENTION

23 v.

24 RICARDO REYNOSO-GARCIA,

25 Defendant.

26 Plaintiff, United States of America, by and through its counsel  
27 of record, hereby requests detention of defendant and gives notice of  
28 the following material factors:

- 29  1. Temporary 10-day Detention Requested (§ 3142(d)) on the  
30 following grounds:
  - 31  a. present offense committed while defendant was on release  
32 pending (felony trial),
  - 33  b. defendant is an alien not lawfully admitted for  
34 permanent residence; and

- c. defendant may flee; or
- d. pose a danger to another or the community.

2. Pretrial Detention Requested (§ 3142(e)) because no condition or combination of conditions will reasonably assure:

- a. the appearance of the defendant as required;
- b. safety of any other person and the community.

3. Detention Requested Pending Supervised Release/Probation Revocation Hearing (Rules 32.1(a)(6), 46(d), and 18 U.S.C. § 3143(a)):

- a. defendant cannot establish by clear and convincing evidence that he/she will not pose a danger to any other person or to the community;
- b. defendant cannot establish by clear and convincing evidence that he/she will not flee.

4. Presumptions Applicable to Pretrial Detention (18 U.S.C. § 3142(e)):

- a. Title 21 or Maritime Drug Law Enforcement Act ("MDLEA") (46 U.S.C. App. 1901 et seq.) offense with 10-year or greater maximum penalty (presumption of danger to community and flight risk);
- b. offense under 18 U.S.C. §§ 924(c), 956(a), 2332b, or 2332b(g)(5)(B) with 10-year or greater maximum penalty (presumption of danger to community and flight risk);
- c. offense involving a minor victim under 18 U.S.C. §§ 1201, 1591, 2241, 2242, 2244(a)(1), 2245, 2251, 2251A, 2252(a)(1)-(a)(3), 2252A(a)(1)-2252A(a)(4),

1 2260, 2421, 2422, 2423 or 2425 (presumption of danger  
2 to community and flight risk);

3  d. defendant currently charged with an offense described  
4 in paragraph 5a - 5e below, AND defendant was  
5 previously convicted of an offense described in  
6 paragraph 5a - 5e below (whether Federal or  
7 State/local), AND that previous offense was committed  
8 while defendant was on release pending trial, AND the  
9 current offense was committed within five years of  
10 conviction or release from prison on the above-  
11 described previous conviction (presumption of danger to  
12 community).

13  5. Government Is Entitled to Detention Hearing Under § 3142(f)

14 If the Case Involves:

15  a. a crime of violence (as defined in 18 U.S.C.  
16 § 3156(a) (4)) or Federal crime of terrorism (as defined  
17 in 18 U.S.C. § 2332b(g) (5) (B)) for which maximum  
18 sentence is 10 years' imprisonment or more;  
19  b. an offense for which maximum sentence is life  
20 imprisonment or death;  
21  c. Title 21 or MDLEA offense for which maximum sentence is  
22 10 years' imprisonment or more;  
23  d. any felony if defendant has two or more convictions for  
24 a crime set forth in a-c above or for an offense under  
25 state or local law that would qualify under a, b, or c  
26 if federal jurisdiction were present, or a combination  
27 or such offenses;

- e. any felony not otherwise a crime of violence that involves a minor victim or the possession or use of a firearm or destructive device (as defined in 18 U.S.C. § 921), or any other dangerous weapon, or involves a failure to register under 18 U.S.C. § 2250;
- f. serious risk defendant will flee;
- g. serious risk defendant will (obstruct or attempt to obstruct justice) or (threaten, injure, or intimidate prospective witness or juror, or attempt to do so).

6. Government requests continuance of \_\_\_\_\_ days for detention hearing under § 3142(f) and based upon the following reason(s):

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7. Good cause for continuance in excess of three days exists in that:

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Dated: February 6, 2025

Respectfully submitted,

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/s/ Alexander H. Tran  
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